

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

APR 9 2025

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TRAVIS SANTEL JONES,

Defendant.

No.

4:25CR179-MTS/SPM

INDICTMENT

COUNT ONE

(Conspiracy to Participate in a Racketeering Enterprise)

The Grand Jury for the Eastern District of Missouri charges, at all times relevant to this indictment, that:

The Cochran Crips Enterprise

1. The Cochran Crips has been a violent street gang based in St. Louis, Missouri— within the Eastern District of Missouri—since the early 2000’s. The Cochran Crips began as a sub- unit or “set” of the “Rolling 60’s Crips” and saw themselves as loosely affiliated with the Crips nationally.

2. The Cochran Crips largely adopted the colors, symbols, and language of traditional Crip sets. For example, Cochran Crips members and associates wore blue clothing, wrapped their firearms with blue bandanas, and wore medallions to memorialize dead gang members and associates and to demonstrate their affiliation with the gang. Some members and associates had tattoos celebrating the gang, its membership, its symbols, and their activities. The Cochran Crips used a system of verbal codes and hand signals to communicate with each other.

3. The Cochran Crips primarily operated out of the Cochran Plaza public housing complex and the Cambridge Heights public housing complex in the Columbus Square neighborhood of North St. Louis. The Cochran Crips considered the O'Fallon Place (OP) Bloods, "the DUB," and "the Blumeyers" to be rival gangs. The Cochran Crips experienced internal violence, with members and associates shooting and murdering one another, over alleged cooperation with law enforcement—a direct violation of gang rules.

4. Older Cochran Crips members garnered respect from other members and directed gang activities. Cochran Crips members and associates relied on the gang for reputation, reach, and resources to commit criminal acts. The Cochran Crips often used minors to commit acts of violence due to gang's perception that minors could not be held accountable under the law. Therefore, much of the gang's violence was conducted by its youngest members and associates.

5. The Cochran Crips used the numbers "819" to symbolize the gang. Members often displayed "819" tattoos or used online monikers and pseudonyms that incorporated "819." Additionally, members and associates have not used the letters "ck" because they believed that it stood for "crip killa." Instead, members and associates substituted "ck" with "cc" in their writing and communication.

6. Members and associates of the Cochran Crips composed rap songs to project the gang's preferred narrative, record gang exploits, and intimidate rivals. The lyrics detailed the motives, means, and methods behind specific acts of violence committed by members and associates of the Cochran Crips.

7. The Cochran Crips had a set of rules to maintain gang discipline and ensure that criminal acts were executed properly. The rules strictly prohibited cooperation with law

enforcement and limited affiliations outside the gang. Gang rules also required members and associates of the Cochran Crips to confront, fight, and/or kill rival gang members when possible.

8. The Cochran Crips frequently punished members and associates who violated gang rules. Violations of the gang's rules, known as "back-door shit," included associating with non- Cochran Crips individuals, refusing to participate in gang activities, or failing to assist other gang members and associates when committing crimes or otherwise engaging in gang-related activity. Punishment included committing violence against or murdering those members and associates that engaged in "back-door shit" or had not otherwise followed gang rules.

9. The Cochran Crips quickly and forcefully retaliated against anyone who was perceived to have disrespected or threatened the gang's authority, power, reputation, membership, or control of their neighborhood. Participation in criminal activity by a member or associate of the Cochran Crips—particularly violent acts directed at rival gangs—increased the respect accorded to that member or associate. Conversely, if a member or associate declined to participate in gang activity, the member or associate would lose respect or be otherwise punished.

10. The Cochran Crips, including its leaders, members, and associates, constituted an enterprise, as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

Purposes of the Enterprise

11. The purposes of the Cochran Crips enterprise included, but were not limited to the following:

- a. Committing crimes of violence to promote and enhance the reputation of the enterprise and to keep rival gang members in fear of the gang;
- b. Enriching members and associates through the trafficking of controlled substances and firearms;
- c. Providing protection and assistance to members and associates who committed crimes on behalf of the enterprise;
- d. Hindering, obstructing, and preventing law enforcement officers from identifying participants in the enterprise's criminal activity, from apprehending the perpetrators of those crimes, and from successfully prosecuting and punishing the offenders.

Means and Methods of the Enterprise

12. Among the means and methods by which members and associates of the Cochran Crips enterprise conducted and participated in the conduct of the affairs of the enterprise included, but were not limited to, the following:

- a. Members and associates of the enterprise generated income through illegal activities committed under the protection of the enterprise—including drug trafficking and other crimes;
- b. Members and associates of the enterprise stole vehicles to commit and facilitate their crimes, including to provide transportation to and from additional crimes;
- c. Members and associates of the enterprise acquired, shared, carried, and used firearms for protection, to perpetuate attacks on rival gang members and others, and to commit retaliatory acts of violence on those whom they perceived had harmed or disrespected the gang;
- d. Members and associates of the enterprise represented their alliance and affiliation with the enterprise through the use of gang-related terminology, symbols, colors,

phrases, and gestures, including through the use of social media, by posting photographs or music videos of themselves with other members and associates, by posting weapons and gang related paraphernalia, and by sending and posting messages referencing their affiliation with the enterprise;

- e. Members and associates of the enterprise punished errant members and associates for violations of gang rules, including through physical assault, shooting, and murder of the offending member or associate. Members maintained and extended their power by committing and conspiring to commit acts involving murder, intimidation, and assault against individuals who were perceived to have posed a threat to the enterprise or jeopardized its operations; and
- f. Members and associates of the enterprise hid, misrepresented, concealed, and caused to be hidden, misrepresented, and concealed, evidence of their criminal activities, and used coded language and other means of communication.

The Racketeering Conspiracy

13. Beginning on a date unknown, but since at least in and around January 2014 and continuing up through and including the date of this Indictment, in the Eastern District of Missouri and elsewhere, defendant **TRAVIS SANTEL JONES, (a/k/a “Treezy,” “Treez,” “Tree,” and “Top”)**, with others known and unknown to the Grand Jury, each being a person employed by and associated with the Cochran Crips, an enterprise engaged in, and the activities of which affected, interstate and foreign commerce, did unlawfully and knowingly combine, conspire, confederate, and agree with others known and unknown to violate Title 18, United States Code, Section 1962(c), that is to conduct and participate, directly and indirectly, in the conduct of the affairs of the

Cochran Crips enterprise through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and (5), which pattern of racketeering activity consisted of:

- a. multiple acts involving murder, chargeable under Missouri Revised Statute §§ 565.020, 565.021, 562.012, 562.014, and 562.041; and
- b. multiple offenses involving drug trafficking, in violation of Title 21, United States Code, Sections 841 and 846.

14. It was further part of the conspiracy that the defendant agreed that a co-conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

Overt Acts

15. In furtherance of the conspiracy, and to effect the object thereof, the defendant, and others known and unknown to the Grand Jury, committed and caused to be committed the following acts, among others, in the Eastern District of Missouri and elsewhere:

- a. From in and around June 2014 and continuing up through and including the date of this Indictment, members and associates of the Cochran Crips, distributed narcotics and controlled substances, including heroin, cocaine, and fentanyl, to raise funds on behalf of the Cochran Crips and its members and associates.
- b. In or about July 2020, **TRAVIS SANTEL JONES**, (a/k/a “Treezy,” “Treez,” “Tree,” and “Top”), conspired and agreed with other Cochran Crips members and associates to murder members of a rival gang in retaliation for the killing of L.H., a senior Cochran Crips member.
- c. On or about July 13, 2020, in St. Louis, Missouri, **TRAVIS SANTEL JONES**, (a/k/a “Treezy,” “Treez,” “Tree,” and “Top”), and other Cochran Crips members and

associates obtained a car and armed themselves with multiple firearms in preparation for killing those responsible for the killing of L.H.

- d. On or about July 13, 2020, in St. Louis, Missouri, **TRAVIS SANTEL JONES, (a/k/a “Treezy,” “Treez,” “Tree,” and “Top”)**, and other Cochran Crips members and associates drove around looking for “get backs” (retaliation) against rival gang members they believed were responsible for killing L.H.
- e. On or about July 13, 2020, in St. Louis, Missouri, **TRAVIS SANTEL JONES, (a/k/a “Treezy,” “Treez,” “Tree,” and “Top”)**, and other Cochran Crips members and associates murdered Arie Bagsby and Omar Harris, believing they were members of the rival gang responsible for killing L.H.
- f. After killing Arie Bagsby and Omar Harris, **TRAVIS SANTEL JONES, (a/k/a “Treezy,” “Treez,” “Tree,” and “Top”)**, and other Cochran Crips members and associates fled the scene of the murders.
- g. On or about July 14, 2020, after the murders of Arie Bagsby and Omar Harris, Co-Conspirator #1 memorialized the event in written rap lyrics that described the method, manner, and motive of the murders while glorifying the Cochran Crips.
- h. On or about March 17, 2021, in St. Louis, Missouri, **TRAVIS SANTEL JONES, (a/k/a “Treezy,” “Treez,” “Tree,” and “Top”)**, and other Cochran Crips members and associates, possessed a stolen vehicle, and distribution amounts of marijuana, fentanyl, heroin, and methamphetamine, along with two firearms.
- i. On or about April 27, 2022, in St. Louis, Missouri, **TRAVIS SANTEL JONES, (a/k/a “Treezy,” “Treez,” “Tree,” and “Top”)**, possessed approximately 60 capsules

containing fentanyl, packaging material, ammunition, and a stolen Smith & Wesson 9mm handgun.

- j. In or about June 2022, **TRAVIS SANTEL JONES, (a/k/a “Treezy,” “Treez,” “Tree,” and “Top”)**, and other Cochran Crips members and associates conspired to murder Nicholas Keith.
- k. On or about June 6, 2022, in St. Louis, Missouri, **TRAVIS SANTEL JONES, (a/k/a “Treezy,” “Treez,” “Tree,” and “Top”)**, and other Cochran Crips members and associates obtained a car, armed themselves with multiple firearms, and drove to the home of Nicholas Keith to kill him.
- l. On or about June 6, 2022, in St. Louis, Missouri, **TRAVIS SANTEL JONES, (a/k/a “Treezy,” “Treez,” “Tree,” and “Top”)**, and other Cochran Crips members and associates murdered Nicholas Keith for his perceived violation of Cochran Crips rules.

Special Sentencing Factors

16. As part of his agreement to conduct and participate in the conduct of the affairs of the Cochran Crips enterprise through a pattern of racketeering activity, **TRAVIS SANTEL JONES, (a/k/a “Treezy,” “Treez,” “Tree,” and “Top”)**, committed the following acts:

- a. On or about July 13, 2020, in the Eastern District of Missouri, **TRAVIS SANTEL JONES, (a/k/a “Treezy,” “Treez,” “Tree,” and “Top”)**, did knowingly cause the death of Arie Bagsby after deliberation on the matter, in violation of Missouri Revised Statute §§ 565.020, 565.021(1), and 562.041.
- b. On or about July 13, 2020, in the Eastern District of Missouri, **TRAVIS SANTEL JONES, (a/k/a “Treezy,” “Treez,” “Tree,” and “Top”)**, did knowingly cause the

death of Omar Harris after deliberation on the matter, in violation of Missouri Revised Statute §§ 565.020, 565.021(1), and 562.041.

- c. On or about June 6, 2022, in the Eastern District of Missouri, **TRAVIS SANTEL JONES, (a/k/a “Treezy,” “Treez,” “Tree,” and “Top”)**, did knowingly cause the death of Nicholas Keith after deliberation on the matter, in violation of Missouri Revised Statute §§ 565.020, 565.021(1), and 562.041.

All in violation of Title 18, United States Code, Section 1962(d).

COUNT TWO

(Murder in Aid of Racketeering)

17. At all times relevant to this Indictment, the Cochran Crips, including its leaders, members, and associates, as more fully described in Paragraphs One through Twelve above, which are realleged and incorporated by references as though set forth fully herein, constituted an enterprise as defined by Title 18, United States Code, Section 1959(b)(2), that is, a group of individuals associated in fact that engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

18. At all times relevant to this Indictment, the Cochran Crips enterprise, including its leaders, members, and associates, engaged in racketeering activity, as defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1); that is, acts involving murder, chargeable under Missouri Revised Statutes §§ 565.020, 565.021, 562.012, 562.014, and 562.041; and offenses involving drug trafficking, in violation of Title 21, United States Code, Sections 841 and 846.

19. On or about June 6, 2022, within the Eastern District of Missouri, **TRAVIS SANTEL JONES, (a/k/a “Treezy,” “Treez,” “Tree,” and “Top”)**, and others known and

unknown to the Grand Jury, for the purpose of gaining entrance to and maintaining and increasing position in the Cochran Crips, an enterprise engaged in racketeering activity, aiding and abetting one another, did murder Nicholas Keith, in violation of the laws of Missouri, specifically, Missouri Revised Statute §§ 565.020, 565.021(1), and 562.041.

All in violation of Title 18, United States Code, Sections 1959(a)(1) and 2.

COUNT THREE

(Use, Carry, and Discharge of a Firearm During and In Relation to a Crime of Violence)

20. On or about June 6, 2022, within the Eastern District of Missouri, **TRAVIS SANTEL JONES, (a/k/a “Treezy,” “Treez,” “Tree,” and “Top”)**, with others known and unknown to the Grand Jury, aiding and abetting one another, did knowingly and intentionally use, and carry, and discharge one or more firearms, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit: Murder in Aid of Racketeering, as set forth in Count Two of this Indictment, in violation of 18 U.S.C. § 1959(a)(1).

In violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT FOUR

(Causing Death Through Use of a Firearm)

21. On or about June 6, 2022, within the Eastern District of Missouri, **TRAVIS SANTEL JONES, (a/k/a “Treezy,” “Treez,” “Tree,” and “Top”)**, with others known and unknown to the Grand Jury, in the course of committing a violation of Title 18, United States Code, Sections 924(c) and 2, as alleged in Count Three of this Indictment, incorporated herein, caused the death of Nicholas Keith through the use of a firearm, which killing constituted murder, as defined in Title 18, United States Code, Section 1111(a), and did aid and abet commission of said offense.

In violation of Title 18, United States Code, Sections 924(j) and 2.

A TRUE BILL.

Date:

FOREPERSON

SAYLER A. FLEMING
United States Attorney
Eastern District of Missouri

DAVID L. JAFFE
Chief, Violent Crime and Racketeering Section
U.S. Department of Justice

NINO PRZULJ, #68334MO
Assistant United States Attorney
Eastern District of Missouri

JARED A. HERNANDEZ, #48404FL
Trial Attorney
U.S. Department of Justice